

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

Terry P. Dor

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

TD Bank, N.A.

Lenore H. Gordon

Keith Nisbet

COMPLAINT

Jury Trial: Yes No

(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name
	<u>Terry P. Dor</u>
	Street Address
	<u>178-31 145th road</u>
	County, City
	<u>Queens, Jamaica</u>
	State & Zip Code
	<u>NY 11434</u>
	Telephone Number
	<u>516-309-2630</u>

B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name TD Bank
 Street Address 1105 Lake Street 3rd Floor
 County, City Bergen Ramsey
 State & Zip Code NJ 07446

Defendant No. 2

Name Lenore H Gordon
 Street Address 1100 Lake Street 3rd Floor
 County, City Bergen Ramsey
 State & Zip Code NJ 07446

Defendant No. 3

Name Keith Nisbet
 Street Address 1100 Lake Street 3rd Floor
 County, City Bergen Ramsey
 State & Zip Code NJ 07446

Defendant No. 4

Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. There are four types of cases that can be heard in federal court: 1) Federal Question - Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case; 2) Diversity of Citizenship - Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case; 3) U.S. Government Plaintiff; and 4) U.S. Government Defendant.

A. What is the basis for federal court jurisdiction? (check all that apply)

Federal Questions Diversity of Citizenship
 U.S. Government Plaintiff U.S. Government Defendant

B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? Title VII of Civil Rights Act of 1964 on basis of discrimination based on race, national origin, and color.

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship New York

Defendant(s) state(s) of citizenship New Jersey

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? In office setting, & over the phone while working from home.

B. What date and approximate time did the events giving rise to your claim(s) occur? Nov 2018 - Nov. 11, 2020 2 pm.

C. Facts: Since working for TD Bank I was denied trainings, fair compensation, bonus', transfer to other departments, transfer to other offices, Networking opportunities, proper working equipment, and Verbally disrespected because of my race, national origin, and color.

i was struck down at every opportunity to learn or advance by Lenore Gordon & Keith Nisbet. Months later I was placed on a PIP (Performance Improvement Plan) and later fired on Nov. 11, 2020. As a new team member I was bullied very badly by Lenore Gordon.

No, not that I am aware of at this moment.

Was anyone else involved?

Who else saw what happened?

Scott Moilarkey, Tadessech Lewis, Sameer Sawe, Dwight Swednick, Teresa Kee

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. Loss of Salary, Emotional distress, & punitive damages

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

I am seeking \$120 Million in Compensation.

Salary \$109,200 + 10% Bonus (Annually)

Loss of property \$200,000. (Estimated) Car & Partial down Payment (home)

Emotional distress

Punitive damages

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 15th day of October, 2021.

Signature of Plaintiff 

Mailing Address 178-31 145th rd

Jamaica NY 11434

Telephone Number 516-309-2630

Fax Number (if you have one) _____

E-mail Address Terrydor01@yahoo.com

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint.

Signature of Plaintiff: 